

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUÑIZ,
MARCUS MARTIN, NATALIE ROMERO,
CHELSEA ALVARADO, JOHN DOE, and
THOMAS BAKER,

Plaintiffs,

v.

JASON KESSLER, *et al.*,

Defendants.

Civil Action No. 3:17-cv-0072-NKM

JURY TRIAL DEMANDED

MOTION FOR *PRO HAC VICE* ADMISSION OF RENATO C. STABILE

Pursuant to Rule 6(d) of the Local Rules for the United States District Court for the Western District of Virginia, I, Robert T. Cahill, an attorney admitted to practice in this Court, and counsel of record in the instant proceeding hereby move the Court for the admission of Renato C. Stabile, Esquire to appear *pro hac vice* on behalf of the Plaintiffs in the above captioned case and in support thereof state as follows:

1. Mr. Stabile is an attorney at Dubin Research & Consulting, 580 Broadway, Suite 400, New York, NY 10012-5233; Phone (212) 219-1469; Email: rstabile@dubinconsulting.com.

2. Mr. Stabile is qualified and licensed to practice law and is a bar member in good standing in the state of New York (Bar ID No. 2867398 – Since 1998). He is also a member of the bar, in good standing, for the following federal courts: U.S. District Courts for the Southern District of New York and the Eastern District of New York, the U.S. Courts of Appeals for the Second Circuit, and the Supreme Court of the United States.

3. Mr. Stabile agrees to submit and comply with the appropriate rules of procedure as required in the case for which he is applying to appear *pro hac vice* as well as the rules and standards of professional conduct applicable to all lawyers admitted to practice before this Court.

WHEREFORE, for the reasons stated above, it is requested that this Court grant this motion and permit Renato C. Stabile, Esq. to appear *pro hac vice* on behalf of Plaintiffs in the above captioned case, and to appear at hearings or trials in the absence of an associated member of the bar of this Court.

Dated: October 21, 2021

Respectfully submitted,

/s/ Robert T. Cahill

Robert T. Cahill (VSB 38562)

COOLEY LLP

11951 Freedom Drive, 14th Floor

Reston, VA 20190-8000

Telephone: (703) 456-8000

Fax: (703) 456-8100

rcahill@cooley.com

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2021, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

Elmer Woodard
5661 US Hwy 29
Blairs, VA 24527
isuecrooks@comcast.net

James E. Kolenich
Kolenich Law Office
9435 Waterstone Blvd. #140
Cincinnati, OH 45249
jek318@gmail.com

*Counsel for Defendants Jason Kessler, Nathan Damigo,
Identity Europa, Inc. (Identity Evropa)*

Justin Saunders Gravatt
David L. Hauck
David L. Campbell
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
jgravatt@dhdglaw.com
dhauck@dhdglaw.com
dcampbell@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

Bryan Jones
106 W. South St., Suite 211
Charlottesville, VA 22902
bryan@bjoneslegal.com

*Counsel for Defendants Michael Hill, Michael Tubbs,
and League of the South*

Joshua Smith Esq.
Smith LLC
807 Crane Ave.
Pittsburgh, PA 15216
joshsmith2020@gmail.com

*Counsel for Matthew Heimbach, Matthew Parrott and
Traditionalist Worker Party*

William Edward ReBrook, IV
The ReBrook Law Office
6013 Clerkenwell Court
Burke, VA 22015
edward@rebrooklaw.com
rebrooklaw@gmail.com

*Counsel for Defendants Jeff Schoep, National Socialist
Movement, Nationalist Front*

I further hereby certify that on October 21, 2021, I also served the following non-ECF Defendants/participants, via electronic mail or First Class U.S. mail, as follows:

Robert Ray
azzmador@gmail.com

Vanguard America
c/o Dillon Hopper
dillon_hopper@protonmail.com

VIA U.S. Mail

Christopher Cantwell 00991-509
Central Virginia Regional Jail
13021 James Madison Hwy
Orange, VA 22960

Richard Spencer
richardbspencer@gmail.com
richardbspencer@icloud.com

Elliott Kline
eli.f.mosley@gmail.com
deplorabletruth@gmail.com
eli.r.kline@gmail.com

/s/ David E. Mills
David E. Mills
Counsel for Plaintiffs